LAW OFFICES OF

JEFFREY LICHTMAN

11 EAST 44TH STREET

SUITE 501

NEW YORK, NEW YORK 10017

www.jeffreyllchtman.com

JEFFREY LICHTMAN
JEFFREY EINHORN
DAVID GELFAND

PH: (212) 581-1001 FX: (212) 581-4999

May 16, 2022

BY ECF

Hon. Paul G. Gardephe United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Gulkarov, et al., 22 CR 20 (PGG) (SDNY)

Dear Judge Gardephe:

I am writing on behalf of defendant Anthony DiPietro to respectfully request a modification of the defendant's conditions of release which would permit him to travel to his home in Highland Beach, Florida from May 25 through May 31, 2022. The government, by AUSA Mathew Andrews, and Pretrial Services have no objection to this request.

By way of background, on January 12, 2022, Judge Moses released Mr. DiPietro on a \$250k personal recognizance bond cosigned by three financially responsible persons, with conditions, *inter alia*, limiting his travel to the Southern and Eastern Districts of New York. In the time since his release, the Court extended Mr. DiPietro's area of travel to include the District of New Jersey so that he may visit regularly with his girlfriend's family.

MEMO ENDORSED

The Application is granted.

SO DRDERED:

Paul G. Gardephe, U.S.D.J.

Dated: May 19, 2022

JEFFREY LICHTMAN

Hon. Paul G. Gardephe United States District Judge May 16, 2022 Page 2

Thank you for the Court's consideration on this application; I remain available for a teleconference should Your Honor deem it necessary.

Respectfully submitted,

Jeffrey Lichtman

cc: Mathew Andrews, Esq.

Assistant United States Attorney (by ECF)

Stephen Boose

Pretrial Services (by email)

So Ordered:

Hon. Paul G. Gardephe